

REMARKS

In the Office Action, pending claims 2-10, 14-22, 44, 45 and 48-53 were rejected, and the previous indication of allowability of claim 20 was withdrawn. By this Reply and Amendment, independent claims 20 and 45 have been amended, and all pending claims are believed to be in condition allowance.

Additionally, the specification was objected to based on the recitation of priority documents on page 1. Accordingly, the information regarding those applications has been updated as requested by the Examiner. The drawings also were objected to as not including reference numerals 70, 82 and 84 discussed on pages 10 and 12 of the application. Accordingly, two sheets of figures have been attached to this Reply and Amendment showing proposed changes to Figures 8 and 14 marked in red. Specifically, reference numeral 70 has been added to Figure 8, and reference numerals 82 and 84 have been added to Figure 14. The objections are believed to be overcome.

Claims 20, 2-4, 7-10, 14-19, 21, 22, 45, 48-50 and 52 were rejected under 35 USC 102(e) as anticipated by the Castano-Mears et al. reference, US Patent No.: 6,457,518. Of these claims, claims 20 and 45 are independent and have been amended to clarify the claim language. Each of the rejected claims is believed patentable over the cited reference.

The Castano-Mears et al. reference discloses a well screen 36 having a generally tubular base pipe 38 and a filtering media overlying the base pipe. (See column 4 lines 46-60). As illustrated and described with reference to figures 3 and 4, the base pipe includes a series of openings 46 or holes 58. (See column 6, lines 24-63). In the alternate embodiment described in column 7, a filtering media 66 is helically wrapped about the base pipe. Instead of welding the filtering media 66 wraps to each other, a connector 72 is welded between adjacent wraps. The connector 72 extends helically about the base pipe. According to the disclosure, the spacing of the filtering media wraps by connector 72 provides a convenient location for lines 74. (See column 7, lines 45-61). This configuration and accompanying disclosure, however, does not suggest that which is currently recited in independent claims 20 and 45.

Specifically, the reference does not disclose or suggest a base pipe "selectively perforated to create an unperforated base pipe portion" combined with a filter media extending about a portion of the circumference of the base pipe to define a first portion covered by the screen material and a second portion of the circumference not covered by the screen material in which the "second portion" is "aligned with the unperforated base pipe portion" as recited in amended independent claim 20. The cited reference does not disclose this overlying alignment of an unperforated portion of a base pipe with an area of the circumference not covered by the screen material so as to accommodate an adjacent-screen device. Additionally, the cited reference does not disclose positioning a completion string in a well, with a screen having a plurality of second portions uncovered by a filter media, combined with "routing a control line along a second portion of the plurality of second portions" and "routing a side conduit along another second portion of the plurality of second portions" as recited in amended independent claim 45. Accordingly, independent claims 20 and 45 are believed to be in condition for allowance.

Claims 2-4, 7-10, 14-19, 21 and 22 ultimately depend from independent claim 20, and claims 48-50 and 52 ultimately depend from independent claim 45. Accordingly, those claims are patentable for the reasons provided above with respect to independent claims 20 and 45 as well as for the unique subject matter recited in each dependent claim.

Claims 5, 6, 51 and 53 were rejected under 35 USC 103(a) as unpatentable over the Castano-Mears et al. reference in view of the Tubel et al. reference, US Patent No.: 6,281,489, or the Perales reference, US Patent No.: 5,163,321. Claims 5-6 ultimately depend from amended independent claim 20, and claims 51 and 53 ultimately depend from amended independent claim 45. Each of these claims is patentable for the reasons provided above with respect to the independent claims from which they depend and for the specific language recited in each dependent claim. The additional references cited by the Examiner do not obviate the deficiencies of the Castano-Mears et al. reference.

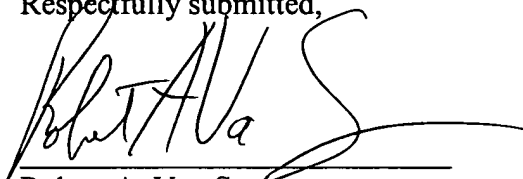
Claim 44 was rejected under 35 USC 103(a) as unpatentable over the Castano-Mears et al. reference. Claim 44 depends directly from independent claim 20 and is patentable for the

reasons cited above with respect to independent claim 20, as well as for the unique subject matter recited in claim 44.

In view of the foregoing remarks, the pending claims are believed patentable over the cited references. However, if the Examiner believes certain amendments are necessary to clarify the present claims or if the Examiner wishes to resolve other issues by way of a telephone conference, the Examiner is kindly invited to contact the undersigned attorney at the telephone number indicated below.

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Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Robert A. Van Someren', written over a horizontal line.

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